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June 2, 2023

Honorable Nicholas G. Garaufis  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East, Room 1426 S  
Brooklyn, New York 11201

**Re: U.S. ex rel. Michael Waldman v. Spectra Holdco LLC et al., 17-CV-2732**

Dear Judge Garaufis:

Following the April 19, 2023 pre-motion conference held in the above-referenced matter, Relator filed a Third Amended Complaint on May 22, 2023, against defendants Spectra Holdco, LLC and Spectra Laboratories, Inc. (Defendants). Counsel for the Defendants seeks to dismiss the amended complaint and, as directed by the Court, the parties have met and conferred for purposes of proposing an agreed-upon briefing schedule for Defendants' motion.

Accordingly, the parties offer the following briefing schedule for the Court's consideration and entry as an Order of this Court as appropriate:

June 20, 2023	Defendants' Motion to Dismiss
July 18, 2023	Relators' Response to Motion to Dismiss
August 4, 2023	Defendants' Reply
TBD by Court	Oral Argument

Sincerely,

A handwritten signature in black ink, appearing to read "James G. McGovern".

James G. McGovern  
Partner  
[james.mcgovern@hoganlovells.com](mailto:james.mcgovern@hoganlovells.com)  
D 212-918-3220

cc: Eric Jaso, Esq. (Waldman's counsel)

**Application granted.**

**So Ordered.**

s/Nicholas G. Garaufis

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**Hon. Nicholas G. Garaufis**

**Date:**